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Docket File Rm 222

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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2 MAR 1993

IN REPLY REFER TO:

7330-7/1700A3

Honorable Steven Schiff
Member, U.S. House of
Representatives
625 Silver Avenue, S.W.
Suite 140
Albuquerque, New Mexico 87102

RECEIVED
MAR - 5 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Senator Schiff:

This is in reply to your letter of February 12, 1993, in which you inquired on behalf of your constituent, Frederick J. Kruzel, regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

Your constituent is specifically concerned about the impact of these changes on radio control (R/C) hobby users. Enclosed is a discussion paper concerning our proposals for the 72-76 MHz band. In short, we expect there would be no adverse impact on R/C operations because of any proposal contained in the Notice.

We are, of course, sensitive to the concerns of both users of private land mobile radio spectrum and R/C hobbyists. We will, therefore, take your constituent's conerns into account when we develop final rules in this proceeding. As indicated in the Notice, we remain convinced that without significant regulatory change in radio operations in the bands below 512 MHz, the quality of communications in the private land mobile radio services will continue to deteriorate to the point of endangering public safety and the national economy.

We want to thank you for your interest. Your constituent's letter will be included in the record of the proceeding. We expect final rules to be issued in 1994.

Sincerely,

Joseph A. Levin
for Richard J. Shiben
Chief, Land Mobile & Microwave Division
Private Radio Bureau

Enclosures
cc:
Chief, PRBureau
Chief, LM&MDivison
Docket Files, Room 222
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CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM
02/18/93

LETTER REPORT

CONTROL NO.	DATE RECEIVED	DATE OF CORRESP	DATE DUE	DATE DUE OLA(857)
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TITLE	MEMBERS NAME	REPLY FOR SIG OF
Congressman	Steven Schiff	BC

CONSTITUENT'S NAME	SUBJECT
Frederick J Kruzel	inq. comments on PR Docket 92-235

REF TO	REF TO	REF TO	REF TO
PRB/mm 2-19-93			
DATE	DATE	DATE	DATE
02/18/93			

REMARKS: Respond to the Albuquerque, NM office.

STEVEN SCHIFF
FIRST DISTRICT, NEW MEXICO

COMMITTEES:
SCIENCE, SPACE, AND TECHNOLOGY
JUDICIARY
GOVERNMENT OPERATIONS
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625 SILVER AVENUE, SW
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SILVER SQUARE
ALBUQUERQUE, NM 87102
(505) 766-2538

PRB
92-235
710

February 12, 1993

The Honorable Alfred C. Sikes
Chairman
Federal Communications Commission
1919 M St NW Rm 814
Washington, D.C. 20554-0002

Dear Mr. Sikes:

The attached information is sent for your consideration. Please review the enclosed material and forward any necessary information for reply to: Congressman Steve Schiff; 625 Silver Ave. SW; Suite 140; Albuquerque, NM 87102.

Thank you for your time and attention in this matter. I look forward to hearing from you soon.

Sincerely,

Steve Schiff

Steven Schiff

SS:cg
Enclosure

February 4, 1993

12600 Indian Place NE
Albuquerque, NM 87112

Congressmen Steven Schiff
625 Silver SE
Albuquerque, NM 87102

Dear Congressmen Schiff:

I would like to enlist your aid in forestalling a problem that I and the members of my model aircraft radio control club on Kirtland Air Force Base will be facing very shortly (Feb. 26, 1993).

The problem is, by FCC Action NPRM PZ Docket 92-235, the FCC is interposing higher powered mobile service frequencies in between lower powered radio controlled aircraft frequencies. The effect is that the radio control aircraft controls is impacted because the higher power spill-over of these mobile units can cause loss of aircraft control ultimately causing the loss of aircraft and potentially damaging persons and property in the area.

As you may know, modern radio control aircraft is sizeable and weight can average from 6 lbs to over 25 or 30 lbs. They also can attain speeds to an average of 60-75 miles per hour. Positive control is essential because damage that can be caused can be severe. We emphasize safety in all of our flying operations, and all of our members carry insurance.

The number of participants in this very challenging hobby of building and flying these models is extensive. We have 35 members in our Kirtland Club; and I know of four other clubs in the Albuquerque area, which are much larger. We are all concerned.

I will not detail the economic impact this FCC action would have on all of us; however, the cost in time and dollars can be considerable. For example, I personally have over $1,500., invested in the building of one aircraft. a one quarter scale North American T-28, which is still being constructed and was begun a year ago.

The FCC Action is serious and I feel the action will breed ill effects.

Can you use your good offices and help us in overturning or redirecting the FCC efforts regarding this action?

I thank you for your past assistance and look forward to the gaining of your support.

Sincerely,

Frederick J. Kruzel

Attachments

- Call Western Union at 1-800-641-1818. Ask for Sport Flyers FCC Hotline #9340

- The total cost is $5.75 which may be billed to your home phone by Western Union or charged to your Mastercard/VISA.

3. You can also use CompuServe to send your letter.

- Prepare your letter.
- For detailed instructions, GO MODELNET and read the file CGRAM.TXT in Library 15.

4. The deadline for sending your comments is February 26. 1993. Please act NOW!

What is Sport Flyers Doing About It?

Sport Flyers is supporting the R/CMA's campaign to get its members and all modelers to protest in writing to the FCC.

- Why the R/C manufacturers? First, they have the most at risk; thousands of jobs, millions of dollars in inventory and production, and the businesses of their dealers and distributors. These risks are more immediate and important than the politics of membership associations.

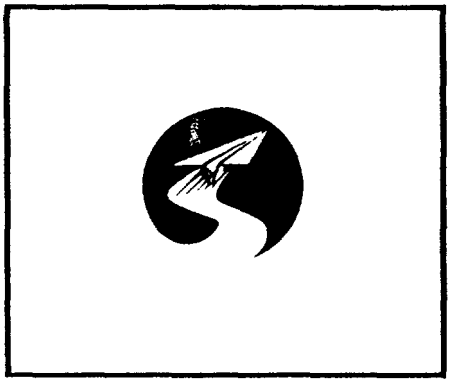
- R/C manufacturers must lead negotiations with the FCC and negotiate solutions that warrant their investment in the technology that will provide long term solutions.

- The only long term solution to frequency challenges will come from technology, not politics. As with other users of the spectrum, technology will require that the R/C industry efficiently use its frequency allocation, and meet narrower spacing tolerances.

HobbyLab is funding development of R/C technology.

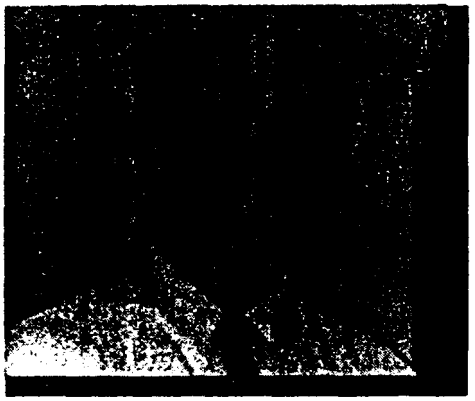
- A development program has been initiated to fund long term improvements in R/C technology with producers both inside and outside the R/C industry.

- HobbyLab is seeking low cost conversion alternatives that will allow existing R/C gear to be upgraded to meet narrower tolerances, determine the feasibility of such conversions if they exist, and bring them to market for all R/C users and producers.



Interview

Robert McNamara
Chief of the Special Services Division
Private Radio Bureau of the FCC



The FCC's Notice of Proposed Rulemaking is a 400-plus page document. When we reviewed it, we had a lot of questions about its effects on RC operations, especially since RC was barely mentioned in the NPRM.

We contacted Robert McNamara, who is Chief of the Special Services Division, Private Radio Bureau of the FCC, the division that controls our RC frequencies. While he is not in the Division that originated the NPRM (the Private Land Mobile and Microwave Division), we felt that he would be able to provide some informed answers. Here is an edited account of that interview.

Sport Flyers(SFA):

Thank you for reviewing the questions we sent and for talking to us today.

Robert McNamara (RM):

You're welcome. Your letter asked questions about an ongoing Commission proceeding, PR Docket No. 92-235, regarding the replacement of Part 90 of the Commission's rules—that's the Private Land Mobile Radio Services. The primary Notice of Proposed Rulemaking in this proceeding is looking for input from the public. The primary purpose of this proceeding is to increase channel capacity and promote more efficient use of the channels for the Private Land Mobile Radio Services. They want to simplify policies, make it easier to use, and more useful to the public.

It is directed at the Private Land Mobile community, not the Radio Control community. The spectrum of 72 MHz is shared. For Radio Control it is a secondary service, just as it is for Private Land Mobile; no interference to TV is permitted.

The NPRM proposes to split the frequencies in the 72-76 MHz band allocated to the Private Land Mobile Services and used for low power operation to make more efficient use of the spectrum. The issue of increased interference potential is something that should be addressed. . .that's the kind of comment they want. . .how will this affect you? The NPRM proposes to go to 5 kHz channel splits. Your community needs to look at this and see if there is a problem.

SFA:

We want to make it clear to our members that no frequencies are

being taken away. It's just that others are being added. Right?

RM:

In essence that is what the Commission is trying to do. The Commission wants to increase spectrum efficiency to allow more users on the same amount of spectrum. You asked if the proposal could be delayed. Anyone who feels that would be useful should suggest it. If there are any other techniques that will solve your problem, that is something you ought to comment on. It is certainly something that has been done in other areas.

SFA:

With the new frequencies that are proposed, operating at 5 kHz spacing, the effect on the RC channels in between is that we have only 2-1/2 kHz spacing from a private land mobile user.

RM:

Now you are talking about the interference potential. From the little that is in the NPRM addressing that, it appears that RC operations were not thought to be threatened. That's the basic issue that I think you have to look at; only you can answer that.

SFA:

The new Private Land Mobile frequencies are allowed to operate at one watt of power. Would it be helpful for us to be allowed to transmit at one watt as well?

RM:

Well, you can certainly ask for more power in a separate proceeding to amend Part 95. Remember, though, the RC use of the band is on a secondary basis, and you must not interfere with TV. The same is true for these proposed new frequencies. Increasing your power might help you, but if you cause interference because of it, it's the RC people who have to shut down, not the TV users. At your present power level, to my knowledge we have never gotten a complaint about RC operations interfering with anyone else. Now, you asked about the rule making process. The Administrative Procedure Act describes the way this is done.

First, a Notice of Inquiry went out suggesting some of the broad changes for the Private Land Mobile Services. The next step was this Notice of Proposed Rulemaking. This sets out the changes that are proposed to be made in the Code of Federal Regulations. The public gets a chance to comment on this; the comment deadline date is February 26, 1993. After that, people can examine the comments and file reply comments; the deadline for those is April 14, 1993.

Once the comments are filed, the staff will sort through all responses and make a recommendation. The Commission may adopt the recommendation, or they may go to a further notice. Many times, if there is not a consensus, the Commission orders another NPRM. If they do not see a need for that, the Commission will issue a Report and Order adopting new rules. Then the final rules are put into the Code of Federal Regulations.

SFA:

This suggests to me that we have to figure out for ourselves what we have to do in order to operate compatibly with Private Land Mobile Services under the new rules.

"One thing I want to discourage is hand-waving and panic. That's not going to help. The problem is technical, and that is what should be addressed...."

RM:

Yes, and that's what the comment period is for. It appeared that splitting the Private Land Mobile channels would not cause a problem for anyone else in the band. But that may not be the case, and that is what you ought to comment about. That is why we take these out in a public forum. I don't think we know everything there is to know about radio communication. The comments are looked at and digested, to try to improve the use of the radio spectrum.

One thing I want to discourage is the hand-waving and panic. That is not going to help. The problem is technical, and that is what should be addressed.

SFA:

Thank you again for addressing these questions with us.

Summation: In light of this interview, it seems that the FCC does not appreciate one fact: that generally our equipment, even at its best, is not sophisticated enough to operate at the frequency spacing they propose. Furthermore, it is evident that the FCC considers this to be our problem.

On the other hand, the FCC is very receptive to what we have to tell them, particularly if we can offer suggestions to minimize the problem or submit solutions to allow the spectrum use to be more efficient for all. The FCC will not ignore your stated concerns—please realize how important it is that you write to the FCC to comment on PR Docket No. 92-235 before February 26, 1993. It is crucial that you get your views on record as your letters will be read, and they can make a difference.

Editorial:

It's Time For A Long Term Solution, Not A Temporary Fix.

Prepared by the staff writers of Sport Flyers, FCC counsel, and interviews with industry manufacturers and experts

A few points become evident from our interviews with industry experts, manufacturers, FCC officials and modelers on the subject of the proposed rule changes by the FCC:

1) **The radio spectrum is not getting any bigger while demand for use of the spectrum is.**
2) **The FCC is focused on dividing the spectrum in the most efficient manner possible to meet this demand.**
3) **The R/C frequencies represent a sizeable target for other users - this challenge is just the beginning.**
4) **Long term solutions will have to come from improved technology.**
5) **The biggest consumer base and the most efficient technology will have the greatest voice in determining use of the spectrum.**

Safety, economics, and other virtues come into consideration when the FCC proposes to implement rule changes. That is a primary reason everyone - including the FCC - suggests that you write in and make your thoughts known. On a broader scale, this challenge to ourR/C frequencies should come as no real surprise. At best, we have merely a lease and not ownership of our R/C frequencies. The solutions offered by the 1991 revisions may prove to be temporary at best, despite the investment of manufacturers and modelers alike.

Technological advances in other industries are placing ever-increasing demand on the spectrum, and the numbers of users demanding access is rapidly growing. As part of this consumer market, most of us are in a dilemma. We like the convenience of our cellular telephones and pagers, the efficiency offered by the latest use of radio driven devices for our businesses, and the feeling of security we get from applications to improve emergency services. We too marvel at the announcement of radio linked personal computers and satellite linked mobile phones. Meanwhile, we want our R/C frequencies to remain untouched. We can't have our cake and eat it too.

So what are the long term solutions that will allow R/C to co-exist with all the other technology demanding use of spectrum? How can the R/C industry succeed in this battle for frequency allocation? Here are some of the answers provided from provided from our interviews and research:

1) R/C manufacturers need a more stable frequency environment.

Just as the costs of the 1991 revisions are starting to be amortized, another change looms on the horizon. This is not the kind of environment that inspires continual investment in technology on the part of the R/C industry .

2) The long term solution is in technology, not in protests and politics.

This is a long term battle of improving technology. Those that offer the best widget to efficiently divide a set of frequencies will also have the best shot at controlling them. R/C equipment will have to make better use of the frequencies allotted, and the efficiency with which we use frequencies will likely determine the allocations we receive.

3) It's time to let the R/C manufacturers take the lead in FCC matters. Membership organizations such as Sport Flyers and AMA should assume a supporting role.

First, if R/C manufacturers are not given the lead, we cannot expect them to make the investment in technology that is essential to meet the demands for frequency allocation. Second, R/C manufacturers and dealers have thousands of jobs and millions of dollars in inventory at stake, all of which make them the first to suffer any adverse impact from the decisions made by the FCC. No one has more at risk, and political posturing should not gamble with the livelihood and businesses of others. The solutions negotiated with the FCC will undoubtedly warrant new investment by R/C manufacturers.

4) There are some near term solutions.

Digitialization for openers. In fact, some manufacturers view the challenges presented in the FCC rule changes as a catalyst for designing technology that will grow R/C instead of threaten it. Two manufacturers said that both civilian and military digital solutions exist which could allow R/C gear to meet the proposed frequency spacing. One of these sources indicated that such digital technology may also be feasible as an upgrade for current R/C gear. Most stated that the best long term solution was a specific set of frequencies (even a smaller number) which could be designation exclusively for R/C. With such designation, manufacturers could invest in the technology to efficiently divide the allotted bands for the broadest and best use by all R/C'ers.

5) This is a numbers game. The more consumers a user group has, the more likely they are to be heard by the FCC. Modeling must become more consumer friendly with growing numbers.

Consumer numbers will be the deciding factor for everything from frequencies to budgets in the coming decade. Unfortunately, the consumer record for R/C and modeling is spotty at best. Consider this point the next time you see a newcomer at your field or in the hobby shop. That newcomer, and thousands of others like him, may represent the difference between the survival and demise of modeling —particularly if that consumer feels more welcome in some other hobby or sport.

Where to start? First, write your letter to the FCC. Second, support the industry manufacturers and the efforts of the R/CMA. Third, put aside the modeling rivalries and petty politics. This is an issue that affects us all and one that we will have to work together on in order to survive. No one person or organization will have bragging rights, whatever the outcome. This challenge for radio frequencies will be a long term battle, and it has just begun.

There is one key area that all in modeling can contribute to that will result in both short and long term solutions: increasing the numbers involved in R/C modeling. There are numerous dealers, manufacturers, clubs, and members which are doing a lot in this area. Unfortunately, they are also a minority. We must face the fact that our industry is generally viewed as consumer hostile - or at a minimum, it presents more barriers than benefits.

A survey by Sport Flyers of new kit purchasers seemed to evidence as much. Of the training kits purchased, an average of only 60% were ever built and completed. Only half those who completed their kits made it past the first few flights, and less than 50% of this group continued through the frustrations of flight training and crashes for a full year. Of this total, a surviving 5% became modelers who statistically will stay active in the hobby for an average of 20 years, spending more annually than the average golfer. That is a consumer number anyone would respect.

If we want better odds with regulatory agencies ranging from the FCC to the local park board, we will have to attract and retain more consumers to this hobby. For manufacturers, that means making products that are more consumer friendly and easier to build and fly. For retailers, it means providing greater service with the sale and a focus on welcoming the entry level consumer. For clubs, it means welcoming newcomers instead of hiding from them, and providing flight training.

FCC SPECIAL REPORT

A Sport Flyers Report With Overviews From the FCC, Industry Experts, And Manufacturers - Information You Need To Know About Proposed FCC Rule Changes

Summary

- The Federal Communications Commission (FCC) has issued a Notice of Proposed Rule Making (NPRM-PR Docket 92-235) which, if implemented, will have a profound effect on model frequency use.
- Proposed by the Private Land Mobile Radio Services, these rule changes would create a massive frequency restructuring by allowing the insertion of two new bands between many existing bands now used by hobby enthusiasts.
- If approved, these rules would go into effect in 1996 and will not take away any RC frequencies. They will, however, make it possible for a licensed commercial operator to transmit on frequencies very close to most of the 72 and 75 MHz bands.
- The proposed rule changes would allow spacing of only 2.5 Kilohertz (kHz) away, versus the current spacing of 10 kHz, for all but 19 of the 50 R/C frequencies.
- The users will be mobile and could interfere with model flying should they come within range of a receiver.
- The FCC is seeking ways to achieve more efficient use of the frequency spectrum to meet growing user demand.

How Could This Affect Modelers?

All 72 and 75 MHz R/C users will suffer some impact if the current FCC proposed rule changes are passed. The following summary outlines just how.

1. Out of the current 50 frequencies available for R/C model aircraft operations, only 19 would be unaffected by the new FCC proposal. Thirty-one of the fifty model aircraft channels would be affected; however, it should be noted that nineteen of the frequencies are not impacted by the proposed rule change.

2. The FCC proposal threatens to make unusable (with current R/C equipment) the 31 R/C channels from 11 through 41. Only R/C channels 42 through 60 and the licensed ham frequencies would not have to contend with new commercial users.

3. One immediate effect (should the FCC proposal be adopted as is) would be to force those who fly on channels 11 through 41 to have their equipment reworked to operate on channels 42 through 60. We could also take the no-code ham test, get licensed, and use the existing ham band equipment on one of the 18 amateur radio frequencies.

4. If you are now operating on the number 42 through 60 channels, you can expect many more users on those frequencies. If you have been flying on channels 11 through 41, you will have to make a decision whether to switch to the upper channels. But this is no simple solution. It would cause severe crowding on channels 42 through 60, practically overnight. Further, in any given location, not all of the channels are free from interference even now.

5. The effect of continuing to use current R/C equipment in the proposed new environment is to cram all of the R/C operations together in much less space than there is available now. A similar situation affects the 75 MHz (car and boat) band.

What You Need To Do NOW

1. Write a personal letter to the FCC and your Congressional Representative to let them know how this proposed rule change will effect you.

The only way the FCC or other regulatory authorities will know how this proposed rule change can impact you is if you tell them. Other suggestions include:

- **Refer to NPRM Docket #92-235**
- **Make it personal.** Explain in your own words how this proposed rule change will affect you.
- **Stress Safety:** Explain how such rule changes could cause interference from other users and result in hazards and accidents.
- **Your investment:** Let the FCC know that you have made a considerable investment in R/C equipment, the numbers of radios that you own, etc.
- **Send your FCC letter to:**
  Federal Communications Commission
  1919 M Street NW
  Washington, DC 20554
- **Send your letter to your Congressmen to:**
  The Honorable (Representative's name)
  United States House of Representatives
  Washington, DC 20515

2. Or, use the Sport Flyers LetterGram. Your protest will be sent directly to the FCC via Western Union.

Although we strongly recommend writing a personal letter as being the best means of communicating with the FCC, we realize that many modelers are busy and will not have the time to do so. The Sport Flyers FCC LetterGram addresses the major issues important to modelers regarding the proposed rule changes, and will be sent in your name directly to the FCC. To use this service:

12600 INDIAN PL NE
ALBUQUERQUE NM
87112

February 4, 1993

FCC
1919 M Street NW
Washington, DC 20554

Gentlemen:

I would like to express my concern over the impact that the FCC Action - NPRM PR Docket 92-235 will have upon radio control aircraft in the 72MHZ band. This concern is dictated from the standpoint of safety and the economic impact it will have upon me and my fellow modelers.

I am a member of a military radio control club on Kirtland Air Force base and have been a radio control modeler since 1954. Much time and dollars have been invested in the pursuit of this hobby.

All of our club members (35) are concerned over the impact the interspersing of mobile frequencies will have on the safe control of our radio control aircraft. From the information we have gained, the impact, on the lower band of our control frequencies through the "swamping" of our lower powered sets, by stronger mobile frequencies would spell disaster to our flying models.

Not withstanding the loss of safe usage of my radio, the economic impacts are substantial. I have invested over a year in building a quarter scale aircraft and spent over $1,500., in the effort.

I request the Commission reconsider its actions and not intersperse mobile frequencies into the aircraft bands. I request that the 10KHZ be kept for safety reasons.

Your action will assure the safe use of our models and generate a continued public good will towards the Commission.

I request your sincere consideration of this request.

Sincerely,

Frederick J. Kruzel
Secretary/Treasurer
Aeromodelers of Kirtland

URGENT! URGENT! URGENT! URGENT! URGENT! URGENT! URGENT!

The following was received this morning from the AMA. Please read carefully and then make and disseminate as many copies as possible. This is RUSH!

FCC Action - NPRM PR Docket 92-235

Following is very important information regarding model frequencies in the 72 - 76 MHz bands.
The proposal could have a devastating affect on our hobby/sport.
Your help in disseminating this information will be appreciated.
If you have further concerns, please contact the Technical Department at AMA HQ.

Urgent Frequency Alert! (Responses needed before February 26, 1993)

To all users of model frequencies in both the 72 and 75 MHz bands.

The Federal Communications Commission (FCC) has issued a *Notice of Proposed Rule Making* (NPRM - PR Docket 92-235) which, if implemented, will have a profound effect on model frequency use. Developed by the FCC Land Mobile Service, it creates a massive frequency restructuring - the first of its type in 60 years.

The 419 page document addresses frequency use in another service (Part 88) but will also affect Part 95 where our RC frequency use lives. Without becoming too technical, the restructuring inserts two new frequencies between those presently assigned for modeling use and commercial users. That means we could have a transmitter almost four times the power output of ours, only 2.5 KHz away from a large number of our 72 and 75 MHz frequencies.

In the 72 MHz band, thirty-one of our frequencies would be bracketed, principally in the lower end of the band (below channel 42). A similar condition would exist in the 75 MHz band. Two examples of the frequency placing would look like the following:

Model Channel 14	72.070 MHz
New Insert	72.0725 MHz
New insert	72.0775 MHz
Present Commercial	72.080 MHz
New insert	72.0825 MHz
New insert	72.0875 MHz
Model Channel 15	72.090 MHz
OR	
Model Channel 62	75.430 MHz
New Insert	75.4325 MHz
New insert	75.4375 MHz
Present Commercial	75.440 MHz
New Insert	75.4425 MHz
New Insert	75.4475 MHz
Model Channel 63	75.450 MHz

Not only are these new frequencies very close to ours, they are also designated as "mobile"; therefore, we would never know where they are operating, including right in the pit area at your field or on the street and highway nearby. In addition, the technical specifications for the new equipment allows a legal frequency tolerance which could place their signal directly on ours!

What can be done to address this situation?

The AMA, with full industry support, will pursue all avenues available through the legal counsel they retain to represent modelers

Frequency Alert!

At the end of 1992 the Federal Communications Commission issued a Notice of Proposed Rule Making (NPRM - PR Docket 92-235). Implementation of the document would have a profound effect on model frequency use. Developed by the Mobile Land Service, the proposal creates a massive frequency restructuring - the first of its type in 60 years.

While the 455 page document addresses frequency use in another service, (Part 88 of the Code of Federal Regulations) it will <u>also</u> affect Part 95 where the RC frequency use lives. With out becoming too technical the restructuring inserts <u>two</u> new frequencies <u>between</u> those presently assigned for modeling use and commercial users. That means we could have a user, higher in power, transmitting only <u>2.5 kHz</u> away from many of our 72 MHz and 75 MHz frequencies!

Example:

Model Channel 12 -	72.030 MHz
new insert	72.0325 MHz
new insert	72.0375 MHz
Present Commercial	72.040 MHz

Not only are these users very close to our frequencies, they are also designated as "mobile" therefore we would never know where they are operating, including right in the pit area at your field! Our equipment will not be free from interference at this spacing! The technical specifications suggest other concerns may exist as well.